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WASTE MANAGEMENT DIVISION

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)

Region 10 Inspection Checklist

Purpose--This checklist is designed to serve as a guideline to the major points of the regulations adopted pursuant to RCRA for inspectors to use while visiting hazardous waste (HW) regulated facilities. This checklist should not serve as a substitute for a detailed knowledge of the relevant regulations. The following is the outline of the checklist.

- I. General Information
- II. Small Quantity Generator (SQG) Regulations (40 CFR 261.5)
- III. Generator Regulations (40 CFR 262)
- IV. Transporter Regulations (40 CFR 263)
- V. Treatment, Storage, and Disposal (TSD) Interim Status Regulations (40 CFR 265)
- VI. Treatment, Storage, and Disposal (TSD) Permit Status Regulations (40 CFR 264)

I. General Information (Date Revised March 8, 1983)

- A. Inspection: Type of Inspection: Evaluation (X); Sampling ( ); Record Review ( ); Special ( ); Follow-up; Post Closure Suspension  
Date/Time Inspection commenced: 06-12-84 9 → 3:00  
EPA inspection WDC was present but did not participate

- B. Facility  
EPA/State ID Ridgefield Smith & Pile WA 12 00 000 0100  
Name & Addresses 3510 NW 285 St Ridgefield WA  
1. Mailing: 111 West Division St.  
2. Location: P.O. Box 519  
Ridgefield WA 98042

Contact: Bruce W. American  
Telephone: (206) 887-3562

<u>C. Compliance Summary</u>	<u>IN</u>	<u>OUT</u>	<u>N/A</u>
RCRA (Statute)	(X)	( )	<del>(X)</del>
40 CFR 270	( )	( )	(X)
40 CFR 124	( )	( )	(X)
40 CFR 261.5	( )	( )	(X)
40 CFR 262	( )	( )	(X)
40 CFR 263	( )	( )	(X)
40 CFR 264 (Permit)	( )	( )	(X)
40 CFR 265	( )	(X)	( )

Specific Violations: This facility is in off-closure  
205.90 GCS wells are not placed to immediately detect contamination  
205.145 Financial Ass for RCRA  
205.300 Leachate discharge from site uncontrolled



D. Inspector

Name (Print) Mike Brown Title: RCRA ENU  
Signature Michael J. Brown  
Organization RCRA  
Phone (206) 442-2652

E. Inspection Participants:

<u>Name</u>	<u>Title</u>	<u>Phone #</u>
<u>Art L. Johnson</u>	<u>RCRA ENU</u>	
<u>James Myers</u>	<u>RCRA ENU</u>	
<u>Rick Pierce</u>	<u>RCRA ENU</u>	
<u>Wendy Dr. O'Connell</u>	<u>RCRA ENU</u>	
<u>Ed Ryb</u>	<u>RCRA ENU</u>	

F. Notification/Permit Information

1. Started operation: 1979 Deposited ~ 4,200 yd Date: \_\_\_\_\_
2. Notification filed: YES NO Date: \_\_\_\_\_
3. Part A application filed: YES NO Date: \_\_\_\_\_
4. Part B called/Date Due YES NO Date: \_\_\_\_\_
5. Part B application: YES NO Date: \_\_\_\_\_
6. Changes in Notification or Part A: \_\_\_\_\_

7. Facility's classified as:

Facility did not  
submit notification  
for Part A

- Facility was closed per  
RCRA Fall '83
- |  |     |
|--|-----|
| Generator                                      | ( ) |
| Transporter                                    | ( ) |
| Treatment facility                             | ( ) |
| Storage facility                               | ( ) |
| Disposal facility                              | ( ) |
| Small quantity generator                       | ( ) |
| Recycler                                       | ( ) |
| Less than 90 day storage                       | ( ) |
| Wastewater treatment unit exemption (WWTU)     | ( ) |
| Elementary neutralization unit exemption (ENU) | ( ) |

8. Does facility have a Part A withdrawal request in ?  
YES NO

Status \_\_\_\_\_

Comments: Disposal Facility

G. Hazardous Waste Generation (HW) and Management (List EPA Waste Code)

1. General information

a. Characteristic HW (DXXX)?

- (1) Ignitability \_\_\_\_\_
- (2) Corrosivity \_\_\_\_\_
- (3) Reactivity \_\_\_\_\_
- (4) EP Toxicity \_\_\_\_\_

b. Listed HW?

- (1) HW from non-specific sources (FXXX) \_\_\_\_\_

- (2) HW from specific sources (KXXX) \_\_\_\_\_

*500' ash ponds waste burn waste*

c. Discarded commercial chemical product (PXXX or UXXX)

- (1) PXXX \_\_\_\_\_
- (2) UXXX \_\_\_\_\_

d. Has facility petitioned to delist waste? YES NO

Date: \_\_\_\_\_ Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

e. Does facility qualify for WWTU or ENU? YES NO

Comments: \_\_\_\_\_  
\_\_\_\_\_

f. Has a determination been made for each waste generated that it is or is not a RCRA hazardous waste?

- (1) What are the wastes generated? \_\_\_\_\_

- (2) How was the hazardous waste determination made for each waste (i.e., lab analyses, knowledge of waste streams or processes, waste listed in Part 261)? \_\_\_\_\_

Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(3) Are records available on the determination(s)?

YES NO

(4) Are all hazardous wastes noted during inspection listed on the facility's RCRA notification/ Part A application?

YES

NO

If so explain.

2. Specific information  
Provide the following information for each of the individual HW streams listed above. (Complete a separate form for each HW.)

- a. EPA HW Code
- b. HW description
- c. Composition (including sampling requirements)
- d. Process producing waste:
- e. Rate of waste production
- f. Time of storage
- g. Waste handling prior to disposal
- h. Waste disposal practice and manifest
- i. Reporting and recordkeeping
- j. Comments

H. Miscellaneous Notes:

N/A

II. Small Quantity Generator (SQG) Regulations 40 CFR 261.5 (Date  
Revised March 8, 1984)

A. General

1. Has the generator ever accumulated more than 1000 kilograms of D, F, K or U coded HW or 1 kilogram of P coded HW [261.5(f)]?  
YES NO
- a. If yes, is the waste stored in containers or tanks?
- b. Is any HW stored in waste piles or surface impoundments?  
YES NO

B. Small Quantity Generator (SQG) Regulations

1. Has generator determined if he generates a hazardous waste (262.11).  
YES NO
2. Which of the following describes the SQG's treatment and/or disposal of his HW?
  - a. occurs on-site  
YES NO
  - b. ensure delivery to an off-site facility, either of which is:
    - (1) permitted under Part 270  
YES NO
    - (2) in interim status under Part 270 and 265  
YES NO
    - (3) authorized to manage HW by an authorized state  
YES NO
    - (4) permitted, licensed or registered by a State to manage municipal or industrial solid waste; or  
YES NO
    - (5) (a) facility which
      - (a) beneficially uses, re-uses recycles or reclaims his HW  
YES NO
      - (b) treats his waste prior to use, re-use, recycle, or reclamation  
YES NO
3. Does generator manifest his wastes (not required)?  
YES NO

W/A  
III. Generator Regulations 40 CFR 262 (Date Revised March 8, 1984)

- A. Is the facility or does facility claim to be a small quantity generator?

YES NO

Comments: \_\_\_\_\_

- B. Does generator transport its own waste?

YES NO

1. If NO, what is contractor's EPA ID, name, address, and phone?

2. If YES, see Transporter Regulations (Section III).

- C. Does generator use the manifest system?

YES NO

1. Does the Generator ever offer his hazardous waste to transporters or to TSD facilities which do not have an EPA ID number?

YES NO

What transporters or TSD facilities?

2. A generator transporting or offering for transport hazardous waste for off-site TSD must first prepare a manifest.

3. If the waste is undeliverable to the primary or alternate facility, the generator must either designate another alternate facility or instruct the transporter to return the waste.

Does the manifest contain the following information:

- a. Manifest document number

YES NO

- b. Generator's name, mailing address, phone number, and EPA ID number

YES NO

- c. Name and ID number of each transporter

YES NO

- d. Name, address and EPA ID number of the designated and alternate TSD facilities, if any.

YES NO

- e. Description of waste(s) required by DOT regulations in 49 CFR 172.101, 172.202, 172.203.

YES NO

- Proper shipping name YES NO
- Hazard Class YES NO
- Identification number YES NO
- f. Total quantity of each hazardous waste by units of weight or volume and type and number of containers placed aboard transport vehicle. YES NO
- 4. Does the manifest contain the certification attesting to proper classification, description, packaging, labeling, marking and condition in accordance with DOT and EPA regulations? YES NO
- 5. Does the manifest contain an adequate number of copies to provide one copy for:
  - a. Generator's records YES NO
  - b. Records of each transporter YES NO
  - c. TSD facility owner or operator's records YES NO
  - d. Signature by each transporter and return to generator YES NO
  - e. Signature by TSD facility and return to generator YES NO
- 6. Does the generator use the manifest properly by:
  - a. Signing the certification YES NO
  - b. Obtaining signature and date of acceptance from initial transporter YES NO
  - c. Retaining one copy of the transporter's signed manifest for 3 years or until receipt of a signed copy from disposal facility YES NO
  - d. Giving transporter the remaining copies of the manifest YES NO
- 7. Does the generator contact the transporter and/or the designated TSD facility to determine the shipment status in the event that a signed copy from the designated facility has not been received within 35 days? YES NO



8. Does the generator submit an Exception Report to the U.S. EPA in the event that a signed copy of the manifest has not been received from the designated TSD facility within 45 days? YES NO
9. The Manifest Exception Report must include
- a. A legible copy of the manifest and
  - b. A letter of explanation describing efforts and results of status investigation.

\*\*\*\*\* TSD FACILITIES SKIP TO MODULE V \*\*\*\*\*

- D. Does generator operate a specific area on-site for container handling or storage? YES NO
1. Does generator comply with the requirements set forth in governing on-site waste accumulation: YES NO
- a. Labeling and marking YES NO
  - b. Dating YES NO
  - c. Inspections (weekly for containers) YES NO
2. Are incompatible wastes segregated? YES NO
3. What quantities of HW are stored? \_\_\_\_\_
4. What is the longest period that it has been stored? \_\_\_\_\_
5. Were there any hazardous wastes stored on site at the time of inspection? (90 day storage allowance is allowed only if waste is stored in accordance with §262.34; i.e. must be stored in containers or tanks. Thus need to make note if storing in waste pile, etc.) YES NO
- a. If yes, do they appear properly packaged (if in containers) or, if in tanks, are the tanks secure? YES NO
  - b. If not properly packaged or in secure tanks, please explain. YES NO
  - c. Are containers clearly marked and labeled? YES NO
  - d. Do any containers appear to be leaking? YES NO
  - e. If yes, approximately how many? \_\_\_\_\_



6. Generators may store hazardous waste for less than 90 days without a permit or TSD status providing certain requirements have been met. YES NO
- a. Are the containers made of or lined with materials which will not react with and are compatible with the hazardous waste to be stored in them? YES NO
- b. Are the containers always closed, except to add or remove waste? YES NO
- c. Are container storage areas inspected weekly for leaks and container deterioration (40 CFR 265.174)? YES NO
- d. Are precautions taken to prevent accidental ignition or reaction of ignitable or reactive waste? YES NO
- e. Are containers holding ignitable or reactive waste located at least 50 feet from the facility's property line? YES NO
- f. Is the facility aware of and complying with the following requirements for incompatible wastes:
- (1) Incompatible wastes must not be placed in the same containers, unless in compliance with 265.17(b) YES NO
- (2) HW must not be placed in an unwashed container that previously held an incompatible waste YES NO
- (3) Are storage containers holding HW that are incompatible with any waste or other material stored nearby separated from or protected from them by means of a dike, berm, wall, or other device? YES NO
- Explain?
- g. Are containers marked or labeled in a manner equivalent to 40 CFR 172 subpart E? YES NO
- h. Comments:

7. a. Does the generator import or export HW? YES NO
- b. If yes, has notification of this activity been submitted to the EPA Regional Administrator? YES NO
- c. Is a copy of that notification available? (If yes, obtain copy). YES NO
- d. If a copy is not available, or can not be obtained, determine: 1) when the notification was submitted; 2) for what waste type and; 3) for what foreign facility (name and address). YES NO

8. TANKS

Where tanks are used to store hazardous waste, the requirement of 40 CFR Part 265 Subpart J must be complied with (except 265.193), as follows:

- a. Is storage in tanks conducted such that:
- (1) It does not generated heat, pressure, fire, explosion or violent reaction? (If no, explain) YES NO
- (2) It does not produce uncontrolled toxic mists, fumes, dusts, or gases? ( If no, explain) YES NO
- (3) It does not produce uncontrolled flammable fumes or gases? YES NO
- (4) It does not damage the tank? YES NO
- (5) It does not threaten the environment in other ways (i.e., leaks, spills)? YES NO

Comments:

- b. Is 2 feet of freeboard maintained in uncovered tanks? YES NO
- If no, is secondary containment used? YES NO
- (Explain)
- c. Is the tank(s) continuously fed? YES NO
- If yes, is there a means to stop inflow? YES NO

Explain

- d. Are inspections of the following conducted:
- (1) Discharge control equipment? YES NO  
How often?
  - (2) Waste feed cut-off systems? YES NO  
How often?
  - (3) Data from tank monitoring equipment? YES NO  
How often?
  - (4) The level of waste in the tank? YES NO  
How often?
  - (5) The structural integrity of tank? YES NO  
How often?  
How are inspections conducted?  
What is observed (looked for)?
  - (6) The immediate area around the tank  
for signs of leaks and the integrity  
of secondary containment (if any)? YES NO
- e. (1) Have any tanks once used for storage of  
hazardous waste been closed or their  
function changed? When?
- (2) Were all hazardous wastes and/or residues  
removed? YES NO
  - (3) What was the disposition of the wastes  
or residues (i.e., where did it go)? YES NO
  - (4) When shipped?
- f. Are ignitable or reactive wastes placed in  
tanks? YES NO
- If yes, what measures are used to prevent ignition  
or reaction?
- g. Have wastes been placed in a tank which  
previously contained potentially incom-  
patible waste or residue? YES NO
- h. (1) If reactive or ignitable wastes are  
stored in covered tanks, are they in  
compliance with the National Fire  
Protection Association's buffer zone  
requirements? YES NO
- (2) Are "No Smoking" signs posted? YES NO

(3) Have others measures been adopted to reduce hazards associated with storage of ignitable or reactive waste in tanks?

YES NO

Explain

9. Preparedness and Prevention (265 Subpart C)

a. Is facility maintained and operated to minimize the hazards of fire, explosion, and sudden or non-sudden releases to the environment?

YES NO

Explain:

b. Is internal emergency communication equipment or alarm systems installed?

YES NO

What type?

c. Is a device (e.g., telephone) immediately available for summoning emergency assistance?

YES NO

d. Are fire extinguishers or other emergency equipment immediately available on-site

YES NO

e. Is emergency communications and response equipment tested?

YES NO

How often?

f. Is aisle space adequate for emergency response?

YES NO

What is aisle spacing?

g. (1) Have any arrangements been made with local emergency response organizations? YES NO

(2) Which organizations?

(3) If local organizations have declined to enter into response agreements, is this documented in the facility's operating record?

YES NO

Explain:

## 10. Contingency Plan/Emergency Procedures

- |    |  |     |    |
|----|--|-----|----|
| a. | Has contingency plan been developed?<br>(It may be a modified SPCC plan)           | YES | NO |
| b. | Have incidents occurred where the plan<br>has been implemented?                    | YES | NO |
| c. | Have incidents occurred where the plan<br>should have been implemented but was not | YES | NO |

Explain

- |     |   |     |    |
|-----|---|-----|----|
| d.  | A copy of the plan should either be<br>obtained for post-inspection office<br>review or it should be examined during<br>inspection for the following: |     |    |
| (1) | Does the plan describe actions to<br>be taken by personnel in response to<br>fire, explosion, or releases to the<br>environment?                      | YES | NO |
| (2) | Does the plan describe arrangements<br>made with external emergency response<br>organizations?  | YES | NO |
| (3) | Does the plan list those qualified to<br>act as emergency coordinator including<br>their name, address, and phone?                                    | YES | NO |
| (a) | Is the list current?  | YES | NO |
| (4) | Is all emergency equipment available at<br>the facility listed in the plan?   | YES | NO |
| (a) | Is the location and a description of<br>the equipment included?   | YES | NO |
| (b) | Are capabilities described for each<br>piece or equipment unit?   | YES | NO |
| (5) | Does the plan include evacuation proce-<br>dures including a description of signals to<br>initiate evacuation (and routes and<br>alternative routes)? | YES | NO |
| (6) | Is a copy of the plan maintained at the<br>active facility (versus main office)?  | YES | NO |
| (a) | Has a copy been supplied to appropri-<br>ate off-site emergency response<br>organizations?  | YES | NO |
|     | To which?   |     |    |

- (7) Is at least one designated person always available to respond to emergencies (i.e., of those on the coordinator list)? YES NO  
How are they available

What are the limits of this person's authority to respond to emergencies?

- (8) Has an emergency occurred? YES NO

Was the plan implemented? YES NO

(Describe the incident)

#### 11. Personnel Training

- a. Has a training program been developed? YES NO

What type? (Classroom? On-the-job Training?)

- b. Does the program include contingency plan and response training? YES NO

- c. Does the program include measures to familiarize personnel with emergency response equipment, procedures, and systems including:

- (1) Procedures for using and maintaining equipment? YES NO

- (2) Key parameters for automatic waste feed cut-off? YES NO

- (3) Communications or alarm equipment? YES NO

- (4) Response to fire and explosion? YES NO

- (5) Response to ground water contamination incidents? YES NO

- (6) Facility shut down? YES NO

- d. Are records available at the facility for the following:

- (1) Job title for each position related to hazardous waste management and maintaining equipment? YES NO

- (2) Written job description for each job title? YES NO

- (a) Does the job description include the skill, education or qualifications required for the position? YES NO
- (b) The duties assigned to that position? YES NO
- (3) A written description of the type and amount of training to be given to those in each job position? YES NO
- (4) A record of training completed or experience obtained for each job position by employee? YES NO
- (5) Was the required training obtained within 6 months of employment or by May 19, 1981, by each individual involved in hazardous waste management activities? YES NO
- E. Is Generator familiar with Generator Reporting Procedures?
1. Annual Reports YES NO
  2. Exception Reports YES NO
  3. Spills and Discharges into the Environment YES NO
  4. Comments
- F. Is generator aware of and complying with regulations concerning the preparation of hazardous waste for transport? YES NO
1. Packaging 40 CFR 173, 178, 179, and with requirements of STATE YES NO
  2. Labeling 49 CFR 172 YES NO
  3. Marking 40 CFR 172 YES NO
  4. Placarding 49 CFR 172 Subpart F YES NO
  5. Containers with of hazardous waste must be marked with the following or essentially equivalent, words and in information, displayed in accordance with 40 CFR 172.304.

HAZARDOUS WASTE - State and Federal Law prohibits improper disposal. If found, contact the nearest police or public safety authority, and the U.S. Environmental Protection Agency.

Generator's Name and Address  
Manifest Document No. \_\_\_\_\_

6. Comments"



G. Are any wastes generated at this facility being transported or stored prior to being recycled, reclaimed, or recovered?

YES NO

1. If yes, what are they \_\_\_\_\_

- |    |                   |     |
|----|-------------------|-----|
| a. | Sludge            | ( ) |
| b. | Characteristic HW | ( ) |
| c. | Listed HW         | ( ) |
| d. | Comments          | ( ) |

N/A

IV. Transporter Regulations (40 CFR 263) (Date Revised March 8, 1984)

- A. Transporter facility description.
1. Operates as a Transfer Facility YES NO
  2. Operates as a Storage Facility YES NO
  3. Operates as a Generator YES NO
  4. Imports Wastes YES NO
  5. Combines Manifested Shipments YES NO
- B. Does transporter have an EPA ID? YES NO
- C. Does the transporter comply with generator regulations under Part 262 if he imports hazardous waste or combines wastes of different DOT shipping descriptions into a single container? YES NO
- D. Does the transporter comply with storage regulations under Parts 270, 264, and 265 if he stores manifested shipments at a transfer facility for more than 10 days? YES NO
- E. Is transporter aware of and complying with manifest requirements under RCRA 263.20?
1. Before transporting HW is manifest dated and signed by generator? YES NO
  2. Does the transporter sign, date, and return a copy of the manifest to the generator before transporting waste off the generator's property? YES NO
  3. Does the transporter delivering hazardous waste to another transporter or the designated facility:
    - a. Obtain a signed and dated (S/D) copy of the manifest? YES NO
    - b. Retain one copy of the manifest containing signatures of the generator, himself, next designated transporter or the designated TSD facility for 3 years from original manifest date? YES NO
    - c. Give remaining copies of the manifest to accepting transporter or designated facility? YES NO

4. Does transporter deliver the entire quantity of HW accepted to:
  - a. The designated facility listed on the manifest? or YES NO
  - b. The alternate designated facility in the event the shipment cannot be delivered to the designated facility? or YES NO
  - c. The next designated transporter? YES NO
5. If delivery is not possible, does the transporter contact the generator and revise the manifest according to instructions? YES NO
- F. In the event of a spill or discharge during transport, does the transporter comply with the requirements set forth in 40 CFR 263.30? YES NO
  1. Give notice to generator YES NO
  2. Give notice to the National Response Center (800-424-8802) if required by 40 CFR 171.15?
  3. Report in writing, as required by 40 CFR 171.16, to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, D.C. YES NO
  4. Comments YES NO

V. TREATMENT, STORAGE and DISPOSAL (TSD) Interim Status Regulations  
Facilities, 40 CFR 265. (Date Revised March 8, 1984)

A. Type of Activity

1. Storage

- a. Containers ( )
- b. Tanks ( )
  - (1) Above ground ( )
  - (2) Below ground ( )
- c. Surface Impoundments ( )
- d. Waste Piles ( )
- e. Other ( )

2. Treatment

- a. Settling ( )
- b. Evaporation ( )
- c. Filtration ( )
- d. Energy Recovery ( )
- e. Incineration ( )
- f. Thermal Treatment ( )
- g. Recycling/Recovery ( )
- h. Chem/Phys/Biological ( )
- i. Other ( )

3. Disposal

- a. Landfill (X)
- b. Land Treatment ( )
- c. Surface Impoundment ( )
- d. Incineration ( )
- e. Other ( )

4. Comments:

5. Are hazardous wastes accepted from "outside" (off-site) sources(wastes not generated on site)? YES NO

- a. If YES, has a chemical and physical analysis of a representative sample been obtained in accordance with 40 CFR 265.13? YES NO

- b. Does the facility confirm that each hazardous waste received at the facility matches the identity of the waste on the manifest? YES NO

- c. How does the facility determine this?

6/A

N/A

B. Subpart B - General Facility Standards (40 CFR 265.10 - 265.17)

1. Does the facility obtain a detailed analysis of his waste prior to storing, treating, or disposing of it? YES NO

Describe:

2. Does the facility follow a Written Waste Analysis Plan  
Does the Plan include?

- a. Parameters to be tested? YES NO  
b. Methods of analysis? YES NO  
c. Methods to get representative samples? YES NO  
d. Testing frequency? YES NO

Comments:

3. Did inspector collect a copy of the Plan for a thorough review of it at EPA's offices? YES NO

4. Security

- a. Have site owner/operators taken appropriate measures to ensure against unauthorized entry? YES NO

(1) Are signs posted at each entrance to active portion, and at other locations, in sufficient numbers to be seen by any approach? YES NO

(2) Are they legible from a distance of 25 feet or more? YES NO

(3) Does the facility have a 24-hour surveillance system or artificial or natural barrier/or combination of both, to control access to the active portion? YES NO

Comments:

5. Does the facility follow a Written Inspection Schedule (40 CFR 265.15)? YES NO

- a. Does it include inspecting all:  
Monitoring equipment? YES NO  
Safety and emergency equipment? YES NO  
Security devices? YES NO  
Detecting equipment? YES NO

- Dangerous waste storage areas? YES NO
- b. Is this inspection schedule maintained at the facility? YES NO
- c. Is an inspection log maintained? YES NO
- (1) Is the log, or its summary, kept at the facility for at least three years from the date of inspection? YES NO
- (2) Does the log include:
- (a) date of time of inspection? YES NO
- (b) inspectors name? YES NO
- (c) observations? YES NO
- (d) date and nature of repairs? YES NO

Comments:

6. Personnel Training (40 CFR 265.16)

- a. Has a training program been developed? YES NO  
What Type? (Classroom/on-the-job)
- b. Does the program include contingency plan and response training? YES NO
- c. Does the program include measures to familiarize personnel with emergency response equipment, procedures, and systems including: YES NO
- (1) Procedures for using and maintaining equipment? YES NO
- (2) Key parameters for automatic waste feed cut-off systems. YES NO
- (3) Communications or alarm equipment YES NO
- (4) Response to fire and explosions YES NO
- (5) Response to ground water contamination incidents? YES NO
- (6) Facility shut down? YES NO

N/A

d. Are records available at the facility  
for the following:

- (1) Job title for each position  
related to hazardous waste manage-  
ment and maintaining equipment? YES NO
- (2) Written job description for each  
job title? YES NO
  - (a) Does the job description  
include the skill, education  
or qualifications required  
for the position YES NO
  - (b) The duties assigned to that  
position? YES NO
- (3) A written description of the type  
and amount of training to be given  
to those in each job position? YES NO
- (4) A record of training completed or  
experience obtained for each job  
position by employee YES NO
- (5) Was the required training obtained  
within 6 months of employment or  
by May 19, 1981, by each individual  
involved in hazardous waste  
management activities? YES NO



C. Subpart C - Procedures and Preventions (40 CFR 265.30)

N/A

1. Is facility maintained and operated to minimize the hazards of fire, explosion, and sudden or non-sudden releases to the environment? YES NO

Explain:

2. Is internal emergency communication equipment or alarm systems installed? YES NO

What type?

3. Is a device (e.g., telephone) immediately available for summoning emergency assistance? YES NO

4. Are fire extinguishers or other emergency equipment immediately available on-site? YES NO

5. Is emergency communications and response equipment tested? YES NO

How often?

6. Is aisle space adequate for emergency response? YES NO

What is the aisle spacing?

7. Have any arrangements been made with local emergency response organizations? YES NO

8. Which organizations?

9. If local organizations have declined to enter into response agreements, is this documented in the facility's operating record? YES NO

Explain:

N/A

D. Subpart D - Contingency Plan and Emergency Procedures 40 CFR 265.50

- |    |  |     |    |
|----|--|-----|----|
| 1. | Has contingency plan been developed?<br>(It may be a modified SPCC plan)           | YES | NO |
| 2. | Have incidents occurred where the plan<br>has been implemented?                    | YES | NO |
| 3. | Have incidents occurred where the plan<br>should have been implemented but was not | YES | NO |

Explain

- |    |   |     |    |
|----|---|-----|----|
| 4. | A copy of the plan should either be<br>obtained for post-inspection office<br>review or it should be examined during<br>inspection for the following: |     |    |
| a. | Does the plan describe actions to<br>be taken by personnel in response to<br>fire, explosion, or releases to the<br>environment?                      | YES | NO |
| b. | Does the plan describe arrangements<br>made with external emergency response<br>organizations?  | YES | NO |
| c. | Does the plan list those qualified to<br>act as emergency coordinator including<br>their name, address, and phone?                                    | YES | NO |
|    | (1) Is the list current?  | YES | NO |
| d. | Is all emergency equipment available at<br>the facility listed in the plan?   | YES | NO |
|    | (1) Is the location and a description of<br>the equipment included?   | YES | NO |
|    | (2) Are capabilities described for each<br>piece or equipment unit?   | YES | NO |
| e. | Does the plan include evacuation proce-<br>dures including a description of signals to<br>initiate evacuation (and routes and<br>alternative routes)? | YES | NO |

- f. Is a copy of the plan maintained at the active facility (versus main office)? YES NO
- (1) Has a copy been supplied to appropriate off-site emergency response organizations? YES NO  
To which?
5. Is at least one designated person always available to respond to emergencies (i.e., of those on the coordinator list)? YES NO  
How are they available
6. What are the limits of this person's authority to respond to emergencies?
- a. Has an emergency occurred? YES NO
- b. Was the plan implemented? YES NO
- c. (Describe the incident)

N/A

E. Subpart E - Manifest System, Recordkeeping, and Reporting 40  
CFR 265.70

1. Manifest System

- a. Upon receipt of a manifested hazardous waste shipment, does the TSD facility:
- (1) Sign and date each copy of manifest receipt of certifying waste? YES NO
  - (2) Note any discrepancies on each copy? YES NO
  - (3) Give delivering transporter one signed and dated copy of the manifest? YES NO
  - (4) Send a S/D copy of the manifest to the generator within 30 days after delivery and? YES NO
  - (5) Retain a copy of each manifest at the facility for 3 years from delivery? YES NO
- b. If the TSD facility initiates a hazardous waste shipment, does it comply with generator requirements in Part 262? YES NO
- c. Does the TSD facility examine manifests and wastes received to detect any significant discrepancies in quantity or type of waste, such as: YES NO
- (1) Bulk waste-quantity variation of 10 percent or greater
  - (2) Batch waste - any variation in piece count
  - (3) Waste type - obvious differences discernible by inspection or waste analysis
- d. If significant discrepancies are found, does the TSD facility:
- (1) Reconcile discrepancies with generator or transporter within 15 days? or YES NO

- (2) Immediately submit to EPA-RA a Discrepancy Report describing the discrepancy and attempts to resolve it and a copy of the manifest involved? YES NO

e. TSD facilities must keep a written operating record documenting the following details:

- (1) Waste description and quantity received
- (2) Methods and dates of its treatment, storage, and disposal
- (3) The location and quantity of each HW at the facility

## 2. Operating Record

- a. Does the owner/operator of the facility maintain an operating record at the facility (40 CFR 265.73)? YES NO
- b. Does the record contain the following information.
  - (1) A description of, and the quantity of each HW received, and the method(s) and date(s) of its treatment, storage, or disposal at the facility? YES NO
  - (2) The location of each Hazardous Waste within the facility, and its quantity? YES NO
  - (3) A map showing disposal sites? YES NO
  - (4) Summary reports and details of all incidents that require implementing the Contingency Plan? Yes NO
  - (5) Records and results of inspections as required (need only be kept three years)? YES NO
  - (6) All closure and post-closure cost estimates required for the facility? YES NO
  - (7) The results of testing and waste analysis? YES NO

N/A

3. Facility Reporting Procedures

- a. Has the owner/operator prepared and submitted a single copy of the Annual Report to EPA by March 1 of each year? YES NO
- b. Is owner/operator familiar with procedures for emergencies? YES NO
- c. If a TSD facility accepts a regulated hazardous waste shipment without the required manifest or shipping paper, does it file an "Unmanifested Waste Report" within 15 days of receipt? YES NO

Information in this section is was reviewed  
in the GW QA/QC Inspector

F. Subpart F - Ground-Water Monitoring (40 CFR 265.90)

1. Are ground-water (GW) monitoring regulations required at this facility? YES NO

2. If YES, what is the relevant process unit?

- a. Surface impoundment ( )
- b. Waste pile ( )
- b. Land treatment ( )
- c. Landfills (X)
- d. Other ( )

Describe:

3. Has the owner/operator implemented a ground water monitoring plan? YES NO

Not adequate

4. If NO, has the facility implemented one of the following:

- a. GW Waiver [265.90(c)] ( )
- b. Alternate GW Monitoring System [265.90(d)] ( )
- c. Neutralization Waiver (265.90(e)) ( )
- d. Describe:

5. Does the ground water monitoring program consist of the following:

\* a. At least 1 upgradient and 3 downgradient wells?

YES NO

b. GW Sampling and Analysis Plan YES NO

c. GW sampling quarterly first year YES NO

d. GW sampling semiannually after that YES NO

e. Drinking Water Standards parameters YES NO

f. GW Quality parameters YES NO

Sampling frequency

g. GW Indicator parameters YES NO

Sampling frequency

h. GW elevation parameters YES NO

i. Outline GW Quality Assessment Program YES NO

j. Statistical Analysis of Indicator parameters YES NO

Results:

\* a. wells downgradient are not placed to immediately detect ground water contamination. They are too far distant from the active unit.



6. Has the facility implemented GW Quality Assessment program?

YES ☒ NO

a. Date: \_\_\_\_\_

b. Results: \_\_\_\_\_

7. Does the facility maintain the necessary records.

a. Initial background parameter concentrations

YES NO

b. Subsequent parameters concentrations

YES NO

c. Statistical evaluations

YES NO

*Three  
quarters  
data*

8. Has the facility reported necessary information

YES NO

a. DW Standards for 1st year

☒ YES NO

b. GW Indicator parameters annually

☒ YES NO

c. Statistical evaluation

YES NO

*- Some change  
data yet*

9. Comments:

G. Subpart G - Closure and Post-Closure (40 CFR 265.110)

Closure

- Facility has submitted a closure plan / post-closure plan  
which has been approved by WDE  
- Closure took place Fall 83
1. Has the facility developed a closure plan which outlines all necessary steps to safely close the facility? (40 CFR 265.117)
    - a. Description of how and when the facility will be partially closed (if applicable) and finally closed?  
YES NO
    - b. Estimate of the maximum inventory of wastes in storage and in treatment at any time during the life of the facility?  
YES NO
    - c. Description of the steps needed to decontaminate the facility equipment during closure? YES NO
    - d. Comment:

Post-Closure

2. Has the facility developed a post-closure plan which contains the following steps to safely care for the facility after closure/post-close of the facility? (40 CFR 265.117)
  - a. Description of how post closure will be carried out for the next 30 years. (X) ( )
  - b. Notice to the local land authority within 90 days after closure is completed? ( ) (X)
  - c. Notice in deed to property? (X) ( )

c.\* & b.\* Info was not submitted to Clark County Auditor until June 8, 1984

- Facility has completed closure & is maintaining the site well.  
- Some erosion was seen  
- cows had walked on site & foot prints go down ~1 ft. Barbed wire fence has recently been placed to keep cows out.

H. Subpart H - Financial Requirements 40 CFR 265.140

1. Liability *Asst closure facilities do not need liability insurance*

N/A

- a. (1) Does facility maintain liability insurance for sudden occurrences in the amount of at least \$1 million per occurrence with an annual aggregate of at least \$2 million? YES NO
- (2) By what method did the owner/operator demonstrate sudden liability coverages to the RA?
- (a) HW facility liability endorsement(s) ( )
- (b) HW facility certificate(s) of liability insurance ( )
- (c) financial test ( )
- (d) corporate guarantee ( )
- (e) multiple mechanisms (specify) ( )
- b. (1) If a surface impoundment, landfill, or land treatment exist at the facility, does facility maintain liability insurance for nonsudden occurrence in the amount of at least \$3 million per occurrence with an annual aggregate of at least \$6 million? YES NO
- (2) By what method did the owner/operator demonstrate non-sudden liability coverage to RA?
- (a) HW facility liability endorsement(s)' ( )
- (b) HW facility certificate(s) of liability insurance' ( )
- (c) financial test ( )
- (d) corporate guarantee ( )
- (e) multiple mehcanisms (specify) ( )

- c. Has owner/operator submitted an originally signed duplicate of liability coverage demonstration to RA?
- d. Is wording of liability coverage instruments identical to that specified in 40 CFR 264.151?

YES NO

Comment:

## 2. Assurance

### a. Closure

- (1) Has facility prepared a written estimate of the cost of closing the facility in accordance with the closure plan (40 CFR 265.112)? Yes NO
- (2) Has this cost estimate been adjusted annually for inflation? YES NO
- (3) Has facility established financial assurance for the closure of the facility (40CFR 265.143)? YES NO
- (4) By what method has this been achieved:
- a. Trust fund ( )
  - b. Surety bond (with standby trust) ( )
  - c. Letter of credit (with standby trust) ( )
  - d. Insurance ( )
  - e. Financial test ( )
  - f. Corporate guarantee ( )
  - g. Multiple mechanisms ( )
- (5) Has facility submitted an originally signed duplicate of financial assurance to RA? YES NO
- (6) Is wording of the financial assurance statement identical to that specified in 40 CFR 264.151. YES NO
- (7) Comment:

N/A

### b. Post-Closure (Disposal Facilities)

- (1) Has facility prepared a written estimate of the cost of post-closure monitoring and maintenance of the facility (40 CFR 265.144)? YES NO
- (2) Has this cost estimate been adjusted annually for inflation? YES NO

\* WDOE in 06-20-83 Notice of Penalty for facility to submit Financial info ≤ 10 days.

not a year

(3) Has owner/operator established financial assurance for the post-closure care of the facility (40 CFR 265.145)? YES ☒ NO

(4) By what method has this been achieved:

- |   |     |     |
|---|-----|-----|
| (a) Trust fund                            | ( ) |     |
| (b) Surety bond (with standby trust)      | ( ) |     |
| (c) Letter of credit (with standby trust) | ( ) |     |
| (d) Insurance                             | ( ) | N/A |
| (e) Financial test                        | ( ) |     |
| (f) Corporate guarantee                   | ( ) |     |
| (g) Multiple Mechanisms                   | ( ) |     |

(5) Has owner/operator submitted an originally signed duplicate of financial assurance to Regional Administrator?

YES ☒ NO

(6) Is wording of the financial assurance statement identical to that specified in 40 CFR 264.151?

YES NO N/A

- PWT C/PC Plan called for the submission of Certification  
- 45 days after closure. Plan was submitted to PWT by 02-15-84

I. Subpart I Use and Management of Containers (40 CFR 265.170)

1. Does this section apply to this facility? YES NO
2. Are the containers made of or lined with materials which will not react with and are compatible with the hazardous waste to be stored in them? YES NO
3. Are the containers always closed, except to add or remove waste? YES NO
4. Are container storage areas inspected weekly for leaks and container deterioration (40 CFR 265.174)? YES NO
5. Are precautions taken to prevent accidental ignition or reaction of ignitable or reactive waste? YES NO
6. Are containers holding ignitable or reactive waste located at least 50 feet from the facility's property line? YES NO
7. Is the facility aware of and complying with the following requirements for incompatible wastes:
  - a. Incompatible wastes must not be placed in the same containers, unless in compliance with 265.17(b) YES NO
  - b. HW must not be placed in an unwashed container that previously held an incompatible waste YES NO
  - c. Are storage containers holding HW that are incompatible with any waste or other material stored nearby separated from or protected from them by means of a dike, berm, wall, or other device? YES NO

Explain?
8. Are containers marked or labeled in a manner equivalent to 40 CFR 172 subpart E? YES NO
9. Comments:

N/A

J. Subpart J - Tanks (40CFR 265.190)

1. Does this section apply to this facility? YES NO

2. Do tanks on the facility hold hazardous waste? YES NO

If so, what are their contents?

---

3. Is storage in tanks conducted such that:

a. It does not generate heat, pressure,  
fire, explosion or violent reaction?  
(If no, explain) YES NO

b. It does not produce uncontrolled toxic  
mists, fumes, dusts, or gases?  
(If no, explain) YES NO

c. It does not produce uncontrolled  
flammable fumes or gases? YES NO

d. It does not damage the tank? YES NO

e. It does not threaten the environment  
in other ways (i.e., leaks, spills)? YES NO

Comments:

4. Is 2 feet of freeboard maintained in uncovered  
tanks? YES NO

If no, is secondary containment used? YES NO

(Explain)

5. Is the tank(s) continuously fed? YES NO

If yes, is there a means to stop inflow? YES NO

Explain

6. Are Hazardous Waste storage tanks operated in a manner  
which minimizes the possibility of overfilling? YES NO

How:

Waste feed cut-off ( )

Bypass system to another tank ( )

High level alarm ( )

Other \_\_\_\_\_



7. Are inspections of the following conducted:
- |  |     |    |
|--|-----|----|
| a. Discharge control equipment?<br>How often?  | YES | NO |
| b. Waste feed cut-off systems?<br>How often?   | YES | NO |
| c. Data from tank monitoring equipment?<br>How often   | YES | NO |
| d. The level of waste in the tank?<br>How often?   | YES | NO |
| e. The structural integrity of tank?<br>How often?<br>How are inspections conducted?<br>What is observed (looked for)? | YES | NO |
| f. The immediate area around the tank for<br>signs of leaks and the integrity of<br>secondary containment (if any)?    | YES | NO |
8. Have any tanks once used for storage of hazardous waste been closed or their function changed? When?
- |  |     |    |
|--|-----|----|
| a. Were all hazardous wastes and/or residues removed?                          | YES | NO |
| b. What was the disposition of the wastes or residues (i.e., where did it go)? | YES | NO |
| c. When shipped?   |     |    |
9. Are ignitable or reactive wastes placed in tanks?
- |  |     |    |
|--|-----|----|
|  | YES | NO |
|--|-----|----|
10. If yes, what measures are used to prevent ignition or reaction?
11. Have wastes been placed in a tank which previously contained potentially incompatible waste or residue?
- |  |     |    |
|--|-----|----|
|  | YES | NO |
|--|-----|----|
12. If reactive or ignitable wastes are stored in covered tanks, are they in compliance with the National Fire Protection Association's buffer zone requirements?
- |  |     |    |
|--|-----|----|
|  | YES | NO |
|--|-----|----|
13. Are "No Smoking" signs posted?
- |  |     |    |
|--|-----|----|
|  | YES | NO |
|--|-----|----|

N/A

14. Have others measures been adopted to reduce hazards associated with storage of ignitable or reactive waste in tanks? YES NO

Explain

15. Waste Analysis and Trial Tests

Before treating and storing of hazardous waste in a tank is a detailed chemical and physical analysis of the waste obtained?

YES NO

16. Does the company have and follow a written waste analysis plan? YES NO

a. Does the plan identify parameters used? YES NO

Explain

b. Sampling Method? YES NO

Explain

c. How frequent is analysis repeated? YES NO

d. Are results of waste analysis and trial tests placed in the facility's operating record.

17. Are waste analyses done when a tank is used to treat or store a HW which is substantially different or treated differently from waste previously treated or stored in the tank? YES NO

K. Subpart K - Surface Impoundments (40 CFR 265.220)

- |    |   |     |    |
|----|---|-----|----|
| 1. | Does this section apply to this facility?   | YES | NO |
| 2. | Does the surface impoundment maintain enough freeboard to prevent any overtopping of the dike by overfilling, wave action, or a storm?  | YES | NO |
| 3. | Are the surface impoundments designed and operated to allow two feet of freeboard?  | YES | NO |
| 4. | Do earthen dikes have a protective cover which minimizes erosion (grass, rock, shale)?  | YES | NO |
| 5. | Is a waste analysis or trail test conducted whenever a surface impoundment is used to chemically treat a HW which is substantially different or treated differently from waste previously treated in the surface impoundment? | YES | NO |
| 6. | Are results of waste analyses documented in the facility's operating record?  | YES | NO |
| 7. | Are the surface impoundments inspected on a routine basis? How often?   | YES | NO |
| 8. | Are ignitable or reactive wastes held in a surface impoundment (40 CFR 265.229)?  | YES | NO |
| 9. | Comments:   |     |    |

N/A

The following 40 CFR Subparts do not have a specific checklist prepared because few of these types of facilities exists in Region X. Inspection made at facilities which operate any of the following would require the inspector to prepare an inspection checklist prior to the site visit.

- L. Subpart L - Waste Piles (40 CFR 265.250)
- M. Subpart M - Land Treatment (40 CFR 265.270)
- N. Subpart N - Landfills (40 CFR 265.300)
- O. Subpart O - Incinerators (40 CFR 265.340)
- P. Subpart P - Thermal Treatment (40 CFR 265.370)
- Q. Subpart Q - Chemical, Physical, and Biological Treatment (40 CFR 265.400)
- R. Subpart R - Underground Injection (40 CFR 265.430)

Subpart N. - Leachate from facility is not completely contained.  
During rainy months, leachate collection we fills & drains  
to the local drainage.

- Some erosion was seen but previous erosion has  
been repaired <sup>pumps</sup> so this erosion probably is not future problem.

**VI. Treatment, Storage, and Disposal (TSD) Permit Regulations (40 CFR  
264) (Date Revised November 21, 1983)**

This Part of the checklist does not have a specific checklist prepared because the checklist would be different for each facility. A compliance inspection made at a facility which has been issued a Part B Permit needs to have checklist and/or narrative which reviews all of the requirements of the facility's Permit. This checklist and/or narrative needs to be developed by the individual inspector.